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*Attorney(s) for Informative Technology Systems, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**INFORMATIVE TECHNOLOGY  
SYSTEMS, LLC,**

*Plaintiff,*

v.

**SECCLORE, INC.,**

*Defendant.*

**CASE NO. 5:21-cv-08504**

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Informative Technology Systems, LLC (“Plaintiff” and/or “ITS”) files this Complaint against Seclore, Inc. (“Defendant” and/or “Seclore”) for infringement of United States Patent No. 8,156,151 (hereinafter “the ‘151 Patent”), and alleges the following:

**PARTIES AND JURISDICTION**

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking damages and such other relief as might be determined.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Wyoming limited liability company with an address of 1 East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301.

4. On information and belief, Defendant is a Delaware corporation with an address of 691 S. Milpitas Blvd, Suite # 217, Milpitas, CA 95035. On information and belief, Defendant may be served through its registered agent, Vishal Gupta, at the same address, or Registered Agents Legal Services, LLC, 1013 Centre Rd, Suite 403S, Wilmington, DE 19805.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

## VENUE

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is a resident of this District. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

**COUNT I**

**(INFRINGEMENT OF UNITED STATES PATENT NO. 8,156,151**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

10. Plaintiff is the owner by assignment of the '151 Patent with sole rights to enforce the '151 Patent and sue infringers.

11. A copy of the '151 Patent, titled "Apparatus, method and system for tracking information access," is attached hereto as Exhibit A.



**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests the following relief:

- A. A judgment that the '151 Patent is valid and enforceable;
- B. A judgment that Defendant has infringed directly one or more claims of the '151 Patent;
- C. An accounting of all damages not presented at trial;
- D. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendant's past infringement at least with respect to the '983 Patent; and.
- E. if necessary, to adequately compensate Plaintiff for Defendant's infringement, an accounting:
  - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys fees against Defendant that it incurs in prosecuting this action;
  - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and
  - iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: November 2, 2021

Respectfully submitted,

/s/ Stephen M. Lobbin

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